



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMH/FJN/MAA/SAC  
F. #2019R00929

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 25, 2022

By ECF and USAFx

John Carman, Esq.  
666 Old Country Road  
Garden City, NY 11530  
Email: [john@johncarmanlaw.com](mailto:john@johncarmanlaw.com)

Re: United States v. Baimadajie Angwang  
Criminal Docket No. 20-442 (EK)

Dear Mr. Carman:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the materials provided on December 23, 2020, and January 13, January 27, February 4, February 23, 2021, April 22, 2021 and February 10, 2022. The government also requests reciprocal discovery from the defendant.

The material enclosed is being produced to you subject to the discovery protective order entered by the Court on November 24, 2020. See ECF No. 28 ("the Protective Order"). The materials are being provided to you via the USAFx platform. Please contact me if you have any issues accessing the materials.

The documents bearing Bates numbers ANGWANG-002412 through ANGWANG-002424 are visa documentation associated with the individuals identified as PRC Officials #1 and #2 in the Complaint. See generally ECF No. 1. These documents are designated "SENSITIVE DISCOVERY MATERIAL" as that designation is described in the Protective Order.

The documents bearing Bates numbers ANGWANG-002425 through ANGWANG-002720 are U.S. Army documentation relating to training courses taken by the defendant, including but not limited to a training entitled "Threat Awareness & Reporting Program" (completed August 15, 2020). Regulations associated with this Program are enclosed within the above-referenced Bates range. The documents in this paragraph are designated "SENSITIVE DISCOVERY MATERIAL" as that designation is described in the Protective Order.

Additional documentation associated with the defendant's NYPD service is enclosed, bearing Bates numbers ANGWANG-002721 through ANGWANG-002736.

Yahoo! subscriber information for an account associated with the defendant is enclosed, bearing Bates number ANGWANG-002737.

A summary translation of a WeChat exchange between the defendant and PRC Official #2 is enclosed, bearing Bates numbers ANGWANG-002738 through ANGWANG-002741. This document is designated “SENSITIVE DISCOVERY MATERIAL” as that designation is described in the Protective Order.

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If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/  
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Trial Attorney  
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U.S. Department of Justice

Enclosures (via USAFx)

cc: Clerk of the Court (EK) (by ECF) (without enclosures)